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Attorney for James D. Cloud

United States District Court
Eastern District of Washington
Honorable Salvador Mendoza, Jr.

United States of America,

Plaintiff,

v.

James Dean Cloud,

Defendant.

No. 1:19-CR-2032-SMJ-1

Updated Exhibit List for
September 29, 2020
Eyewitness ID Hearing

On June 17, 2020, James Cloud submitted an exhibit list for the June 23, 2020 eyewitness ID hearing.¹ Since that time, the Court reset the hearing and will consider two additional motions.² Given these updates, an amended exhibit list is necessary:

#	Description
1000	Line-Up 5033 (James Cloud)
1001	YCSO – Line-Up Instructions for J.V.
1002	YCSO – Eyewitness ID Policy
1003	Screenshot from Text Exchange Between FBI Special Agent Ronald T. Ribail and J.V.
1004	SA Ribail’s 302 Report Documenting Line-Up with J.V.
1005	SA Ribail’s 302 Report Documenting Follow-Up with J.V. on Facebook Search
1006	James Cloud Wanted Poster
1007	James Cloud’s Booking Photo – 06.10.2019
1008	James Cloud Side-by-Side Photos
1009	January 6, 2017 Memo from Deputy Attorney General Sally Yates to All Law Enforcement Heads

¹ ECF No. 173.

² See ECF No. 185 (Motion in Limine Re: Lindell LaFollette’s False Memory); ECF No. 186 (Motion to Exclude E.Z.’s Unreliable ID).

#	Description
1010	October 1999 – Department of Justice – Eyewitness Evidence – A Guide for Law Enforcement
1011	FBI Eyewitness ID Policy Implementation Guide – 11.26.2013
1012	FBI Eyewitness ID Policy Implementation Guide – 06.09.2019
1013	Line-Up 5032 (Donovan Cloud)
1014	Line-Up 5034 (Morris Jackson)
1015	Line-Up 5035 (Natasha Jackson)
1016	SA Ribail’s 302 Report Documenting Line-Up with L.L.
1017	YCSO Line-Up Instructions for Lindell LaFollette
1018	SA Ribail’s 302 Report Documenting Follow-Up Interview with Lindell LaFollette – Saw James Cloud in the News
1019	Line-Up 5038 (James Cloud) – Used for E.Z.
1020	Line-Up 5039 (Donovan Cloud) – Used for E.Z.
1021	Line-Up 5040 (Morris Jackson) – Used for E.Z.
1022	Photo – F-250

James Cloud reserves the right to amend this witness list in the interests of justice.

1 Dated: September 24, 2020

2 Federal Defenders of Eastern Washington & Idaho
3 Attorneys for James D. Cloud

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7 **Service Certificate**

8 I certify that on September 24, 2020, I electronically filed the foregoing
9 with the Clerk of the Court using the CM/ECF System, which will notify
10 Assistant United States Attorneys: Tom Hanlon and Richard Burson.

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17
18
19 Updated Exhibit List